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May 15, 2025

**VIA ECF**

Honorable Miroslav Lovric  
United States District Court  
Northern District of New York  
15 Henry Street  
Binghamton, New York 13901

**Re: *Shara v. Binghamton Precast & Supply Corp. et al.***  
**Civil Action No. 3:23-cv-135**

Dear Judge Lovric:

Please accept this letter as the parties' joint status report pursuant to your most recent order. There are still outstanding document discovery issues that the parties anticipate being resolved by the end of May 2025. As explained in our prior status report, the Plaintiff has been reviewing physical records in order to limit what records are duplicated, thus reducing time and expense. The Defendants anticipate completing disclosure of e-discovery materials also before the end of the month.

We anticipate that we are on time for document discovery completion by June 5, 2025 and can then complete depositions within the applicable window.

Thank you for your continued assistance and patience as the parties have worked out these issues.

Very truly yours,

BOND, SCHOENECK & KING, PLLC



Angelo D. Catalano

cc: All counsel of record (via ECF)